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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

January 25, 1999

Reply To
Attn Of: ECO-088

Mr. James L. Caswell, Forest Supervisor
Clearwater National Forest
12730 Highway 12
Orofino, Idaho 83544

Ref: West Fork Potlatch Draft EIS

Dear Mr. Caswell:

The U.S. Environmental Protection Agency has reviewed the West Fork Potlatch Draft Environmental Impact Statement (DEIS). We are submitting comments on the DEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. We thank you for your willingness to extend the period of acceptance for our comments.

The West Fork Potlatch DEIS is a rather broad land management document because it incorporates decision making for at least 3 categories of management activity for the analysis area: forestry, grazing, and noxious weed control. The main component of the DEIS is its analysis with respect to forestry. Four alternatives are presented: the no action alternative and 3 action alternatives. The preferred Alternative E prescribes timber cutting of 3,146 acres, construction of 17.5 miles of new road of which 14.5 would be permanent or long term road, and offers a sale volume of 23.7 million board feet.

The action alternatives vary primarily in terms of the total acres treated with regeneration and intermediate cutting, the miles of new roads, timber volumes offered, and the use or non-use of a small amount of horse logging. Alternative E is less aggressive than Alternative C in terms of resource extraction, and more aggressive than Alternative D, which was intended to address water quality and wildlife.

For noxious weed control, three alternatives are offered: the no action Alternative 1; Alternative 2, which applies chemical and non-chemical controls; and Alternative 3, which applies non-chemical controls only.

No grazing alternatives are offered, however, renewal of one grazing permit, the Nat Brown-Purdue Creek Allotment, is being examined with the West Fork Potlatch analysis. The West Fork Potlatch-Moose Creek Allotment was recently analyzed with the Potlatch River Grazing Allotment Environmental Assessment (EA), and a Decision Notice was issued on 6/25/96.

We have rated the West Fork Potlatch DEIS as EO-2, Environmental Objections, Insufficient Information. A description of the rating system is included with this letter, and our concerns are explained in the detailed comments, which follow. Our most notable concerns are (1) the water quality analysis, which does not adequately evaluate the impacts of grazing and mass wasting; (2) the construction of 14.5 miles of new long-term or permanent roads, which offsets the benefits of road obliteration, exacerbates already degraded water quality, and stresses the Forest Service's ability to maintain roads; and (3) the failure to treat the Potlatch basin as a key watershed pursuant to the June, 1998 NMFS biological opinion for steelhead trout.

Since the project involves an area that is habitat for steelhead and the project has the potential to further impact currently degraded habitat for this species, a biological assessment should have been included, as well as the biological opinion issued by NMFS and its implications for this project. Specifically, the relevance of the NMFS designation of the Potlatch basin as a key watershed for steelhead, and incorporation of the requirements of that designation into the alternatives and management prescriptions should have been provided.

All of this information is vital to decision making; without it, the DEIS does not adequately meet NEPA's purpose of full disclosure. We recommend that the Forest Service consider the value of withdrawing this DEIS and issuing a revised document. The easiest way to do that might be to issue a supplemental DEIS that incorporates the missing information regarding the water

quality analysis, threatened species, and other issues raised in our detailed comments.

If you have questions or would like to discuss these comments further, please contact Elaine Somers of my staff at (206) 553-2966. Thank you for the opportunity to provide comment.

Sincerely,

Richard B Parkin

Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosures

Environmental Protection Agency, Region 10
Comments Regarding the West Fork Potlatch Draft EIS

Scope of the analysis. The West Fork Potlatch DEIS is a rather broad land management document because it incorporates decision making for at least 3 categories of management activity for the analysis area: forestry, grazing, and noxious weed control. We suggest that the subsequent document include a list of "decisions to be made" in the summary and opening sections, because currently the full breadth of decision making is unclear until the reader has reviewed most of the document.

While it is appropriate to examine the cumulative impacts of various land management activities in making project level decisions, it is unusual to compile multiple resource management decisions within one project area-specific analysis. That is not to say that it cannot or should not be done, but that there is the potential to become unwieldy in terms of the document's focus and the level of analysis may not be adequate to support the decisions to be made. We encourage you to examine the response of reviewers to this approach, and modify this and/or future analyses if need be.

Water Quality. As indicated in the DEIS (p. III-60), the Potlatch River watershed, and the streams within the West Fork Potlatch analysis area, are listed by the State of Idaho as water quality limited due to sediment. In addition to sediment, the Potlatch River and Moose Creek are also listed for temperature, instream flow, nutrients, habitat alteration, pathogens, and for Moose Creek only, pH.

For water quality limited streams for which no Total Maximum Daily Load (TMDL) has been prepared, the project proponent must demonstrate no net increase of the pollutant(s) of concern, and preferably a decrease. Consequently, the Forest Service has conducted analyses using the WATBAL model to estimate sediment delivery to streams from the various alternatives, and has subtracted anticipated sediment reductions due to road closures, road resurfacing, road relocation, and other actions. The impacts of grazing, while noted throughout the document, have not been factored into the WATBAL analysis, nor does WATBAL appear to include sediment delivery resulting from potential mass wasting events (landslides).

While the Forest Service states on page III-71 that the West Fork Potlatch analysis area is considered to be at low risk for landslides, we do not necessarily concur with that conclusion. This is because, with respect to landslide risk, the analysis area is located fully within the rain-on-snow zone; 20% of the terrain, due to topography, is at high risk for landslides; 49% of the area is composed of high risk parent material; there is a lack of large woody debris (LWD) in the stream systems to dissipate energy; the area is heavily roaded and the project will add another 17.5 miles of new road (14.5 of which would be permanent/longterm; about 14 miles have been obliterated in preparation for this project); the hydrograph for the basin has been altered to become very "flashy"; streams have been channelized due to historic railroad logging; 4 major landslides (debris torrents) and widespread sloughing and erosion occurred in the analysis area after the 1995-96 floods; and land management activities on non-USFS land in this mixed ownership area will continue at unabated levels (primarily logging and grazing within the analysis area).

The Forest Service, too, emphasizes resource extraction in this management area according to Forest Plan direction. Alternative E is very aggressive in this respect, and does not leave us with the impression that a compromise or balance has been achieved with respect to ensuring the health of all ecosystem components, particularly of the fish and wildlife, and of the recovery of the aquatic ecosystem. The USFS sediment analysis indicates that over an 11 year period, there will likely be a net reduction of sediment. However, the aquatic system will need to absorb a great deal more sediment from proposed land management activities in the short term. This is always a gamble, particularly when stochastic disturbance events are not factored into the analysis.

The Forest Service's guiding premise for "sustaining ecosystems and protecting biodiversity now and into the future is to manage ecosystems such that structure, composition, and function of all elements, including their frequency, distribution, and natural extinction, are conserved. 'Conservative' management means giving the benefit of doubt to the resource rather than to its extraction or development. This principle has been elaborated formally as the 'precautionary principle.' The principle applies when there is uncertainty

about possible cumulative effects, irreversible changes, adverse interaction, or negative long-term effects (*An Ecological Basis for Ecosystem Management*, USFS, GTR RM-246, 1994)." From our perspective, the scope and nature of proposed actions in Alternative E do not provide this benefit of doubt.

Roads. In the spirit of the moratorium on new forest road construction, and in deference to the threatened status of the steelhead trout, we would hope that the Forest Service would work to decrease road densities, as per the ICBEMP recommendations, and as per the key actions identified for the Forest Service in the *Clean Water Action Plan: Restoring and Protecting America's Water*, which calls for increasing road maintenance, relocation, decommissioning, and obliteration. The net benefits to water quality and fish habitat are very small if road obliterations are simply replaced by additional new roads. The net effect for wildlife is clearly negative.

Alternative D is the only option presented that is sensitive to the need to avoid new road building. Because the Forest Service proposes to do more in terms of mitigation to arrest sediment under Alternatives C and E, the sediment analysis shows a larger net reduction in 11 years time for these two alternatives than for Alternative D. However, the sediment delivery resulting from actions in Alternative D is far less than for the other action alternatives. We see no reason why additional measures to arrest sediment cannot be implemented with Alternative D, which would result in a much greater projected net reduction in sediment over the 11 year period and much greater progress in restoring aquatic habitat. We urge the Forest Service to adopt this approach.

Monitoring. The post-sale monitoring plan (p. II-38) indicates that BMP implementation and effectiveness monitoring will be conducted "on at least one logging unit and the road therein during or immediately after land management activities." We do not feel that monitoring of only one logging unit constitutes an acceptable sample size for determining the percent compliance and success of BMPs. We also think that follow-up monitoring at appropriate time intervals and during disturbance events subsequent to the timber sale are needed to adequately assess BMP effectiveness. Timeframes for the other post-sale monitoring commitments are also needed, as well as a clear

indication of how the Forest Service intends to assure that the monitoring plan will be implemented. We recommend that you augment the monitoring plan to include these features.

Fish. In accord with the June 19, 1998 Biological Opinion of NMFS regarding steelhead trout, which are present in the analysis area, the Potlatch watershed was designated a key watershed. On page II-39 of the DEIS, the Forest Service indicates that the West Fork Potlatch DEIS was prepared for a non-key watershed. The DEIS provides no explanation as to the implications of the key watershed designation nor, consequently, the extent to which the current analysis may be inadequate to support decision making. We anticipate that the NMFS designation requires additional protection and assurance that the continued survival and recovery of steelhead trout will not be jeopardized. In addition, a biological assessment should have been included, as well as the results of the consultation with National Marine Fisheries Service (NMFS) regarding steelhead.

The absence of information regarding the requirements of key watersheds, a discussion of their significance, and incorporation of those requirements into the analysis is a significant omission in the DEIS. From a legal perspective, the analysis must demonstrate compliance with all applicable statutes, including but not limited to NEPA, the Clean Water Act, and the Endangered Species Act. Because the DEIS lacks a complete analysis of management actions and their implications within the existing legal framework, which is vital to decision making, the appropriateness and viability of the alternatives are in question.

The Forest Service states in the DEIS that chinook salmon, which were historically present, are no longer in the Potlatch watershed. There is no explanation for this provided. While we recognize that the reasons are several and complex (harvest, habitat, hatcheries, and hydro), this species should be addressed, particularly with respect to any recovery plans that may exist for the extirpated stocks and the Forest Service's responsibility to manage for all species. In other words, if it is important to re-establish historic vegetative composition, patch size, and connectivity in the terrestrial environment, it is equally important to do so for the aquatic environment. As stated, the purpose and need for this project is "to restore and

protect ecosystems, and to provide multiple benefits within the capabilities of ecosystems (p. Summary-1)." Clearly, the capability of the aquatic ecosystem has been exceeded, and the emphasis must necessarily be placed upon restoration and protection.

Wildlife. We were disappointed to note that the Forest Service has dismissed the lynx as a species of concern with respect to this analysis. The confirmed sighting of the female lynx and her kitten, and the 3 unconfirmed sightings should be a stimulus to take a closer look, particularly for a species with an estimated home range of between 5 and 20 square miles. According to the National Forest Management Act (NFMA) and the Forest Service guiding principles for ecosystem management, it is important to provide for the viability of all species in the project area, and to give those species (or potential species) the benefit of the doubt.

Snags and Down Woody Material. Timber cutting, particularly using the cut-to-size system that is prescribed for a large portion of the analysis area and slash burning, can affect the availability of snags and downed woody material. The 40% Forest Plan standard for snags "does not recognize the importance of snags and downed woody material for other ecological functions", e.g., habitat for a variety of wildlife species, nutrient cycling and soil development, and structure for aquatic habitat (p. Summary-10). Currently, the project area meets the 40% standard, but does not necessarily meet the need for all ecological functions. We recommend that the prescriptions in the alternatives be adjusted to provide a greater margin of safety to support ecological processes in the forest.

Horse Logging. Alternative E, which includes 300 acres of horse logging, is the only alternative that includes this feature. We see no reason why horse logging should not be included with the other action alternatives, particularly Alternative D. If provision of jobs is a factor in decision making (p. IV-91,92), it makes sense to include horse logging to diversify the employment base and to sustain the practice of this low impact form of tree removal.

Grazing. No alternatives were presented for grazing, thus it appears that the decision to issue the Nat Brown-Purdue Creek

Allotment is a foregone conclusion. Throughout the DEIS, there is frequent mention of the damages done to the riparian and aquatic environments by cattle, e.g., sediment generated from erosion and unstable streambanks, altered stream morphology, loss of vegetation, wildlife cover and nesting habitat, introduction of weeds, and other impacts. These environmental consequences are not comprehensively addressed in this document nor were these damages integrated with the environmental consequences analysis (e.g., the sediment modeling), which affects decision making for prescribed timber management. With respect to grazing permit issuance, we do not believe that this DEIS presents an adequate framework for decision making. It also does not comply with NEPA, which requires the generation of alternatives. Consequently, we urge that you improve the analysis, generate alternatives, and incorporate the impacts of grazing into the broader analysis and decision making for the project area.

Noxious Weed Control. In addition to the existing acreage affected by noxious weeds, due to ground disturbing activities, Alternative C would require that an additional 20 acres be treated for noxious weed control; Alternative E would require an additional 10 acres be treated; and Alternative D would require only one new acre of treatment. Since the best control is prevention, noxious weed control would best be addressed by adopting Alternative D as the preferred alternative.

As shown on p. Summary-3, in most cases herbicides are the preferred approach to weed control in Alternative 2. This does not coincide with the stated goal of using the principles of integrated pest management (IPM). Herbicides should be used as a last resort, not as the preferred approach as shown. Although the Forest Service assures that risks are low, we are concerned that herbicides proposed for use in Alternative 2 are persistent, have the potential to contaminate ground water, and/or are non-selective. Use of herbicides can also affect soil biota and soil productivity. For these and other reasons, we recommend that Alternative 3, Non-chemical, be tried.

Trails. There are currently 86 miles of motorized trails in the analysis area. The proposal under action alternatives C, D, and E is to construct 14 more miles of trails, 9 of which would be non-motorized and located in the northern portion of the analysis area near the remnant old growth and designated

replacement old growth; 5 new trail miles would be motorized. Since wildlife security is of concern, it seems unadvisable to construct 9 new miles of trail in the northern portion of the analysis area near the old growth reserves, and to add 5 more miles of motorized trail, which combined with the high road density, will further impact wildlife security. We suggest, rather, that the Forest Service consider converting some of the motorized trails to non-motorized trails, and construct no new trails.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonaby available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.